

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

Attorneys at Law

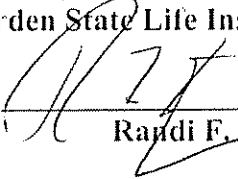
88 Pine Street, 24th Floor

New York, New York 10005

Attorneys for Plaintiff,

Garden State Life Insurance Company

By:



Randi F. Knepper

GARDEN STATE LIFE INSURANCE
COMPANY,

Plaintiff,

vs.

CARLOS PEREZ OLIVO and
THE ESTATE OF PEGGY HALL,

Defendants.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CIVIL ACTION NO.: 07-cv-10449(BSJ)

CIVIL ACTION-NOTICE OF MOTION ON BEHALF OF PLAINTIFF SEEKING
EXTENSION OF TIME TO AFFECT SERVICE ON DEFENDANT, ESTATE OF
PEGGY HALL, PURSUANT TO FED. R. CIV. P. 4(m)

TO:

Domenick Napoletano, Esq.
351 Court Street
Brooklyn, New York 11231
Attorney for Defendant,
The Estate of Peggy Hall

ON NOTICE TO:

Robert A. Buckley, Esq.
Law Offices of Robert A. Buckley
310 West 55th Street, Suite 1K
New York, New York 10019
Attorneys for Defendant,
Carlos Perez Olivio

PLEASE TAKE NOTICE that at a time and date to be determined by the Court, the undersigned, attorneys for the plaintiff, Garden State Life Insurance Company, shall move before the United States District Court, Southern District of New York, located at United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order extending the time to effect service on defendant, the Estate of Peggy Hall, pursuant to Fed. R. Civ. P. 4(m).

PLEASE TAKE FURTHER NOTICE that in support of the within Notice of Motion, the undersigned will rely upon the within Certification of Counsel, proposed form of Order, Certification of Service, and all pleadings and proceedings to date.

McElroy, Deutsch, Mulvaney & Carpenter LLP
Attorneys for Plaintiff,
Garden State Life Insurance Company

Dated: March 17, 2008

By: _____

Randi F. Knepper

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McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

Attorneys at Law

88 Pine Street, 24th Floor

New York, New York 10005

Attorneys for Plaintiff,

Garden State Life Insurance Company

By: _____

Randi F. Knepper

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|------------------------------------|---|---|
| GARDEN STATE LIFE INSURANCE | : | UNITED STATES DISTRICT COURT |
| COMPANY, | : | SOUTHERN DISTRICT OF NEW YORK |
| | : | |
| Plaintiff, | : | CIVIL ACTION NO.: 07-cv-10449(BSJ) |
| | : | |
| vs. | : | |
| | : | |
| CARLOS PEREZ OLIVO and | : | |
| THE ESTATE OF PEGGY HALL, | : | |
| | : | |
| Defendants. | : | |
| | : | |

CIVIL ACTION- ORDER

THIS MATTER having been opened to the Court upon the application of McElroy, Deutsch, Mulvaney & Carpenter, LLP, attorneys for the plaintiff, Garden State Life Insurance Company ("Garden State"), for an Order extending the time to affect service on defendant, the Estate of Peggy Hall, pursuant to Fed. R. Civ. P. 4(m), and upon notice to all parties, and the Court having reviewed and considered all moving and opposing papers, having heard argument of counsel, and finding good cause existing for the entry of the within order;

IT IS on this _____ day of _____, 2008;

ORDERED that Garden State's motion seeking an extension of time to affect service on the Estate of Peggy Hall is granted; and it is further

ORDERED that time for Garden State to affect service on defendant, the Estate of Peggy Hall, is hereby extended for a period of 90 days; and it is further

ORDERED that counsel for Garden State shall serve a copy of this Order on all parties within seven days of the date hereof.

Honorable Barbara S. Jones, U.S.D.J.

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McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

Attorneys at Law

88 Pine Street, 24th Floor

New York, New York 10005

Attorneys for Plaintiff,

Garden State Life Insurance Company

By: 

Randi F. Knepper

**GARDEN STATE LIFE INSURANCE
COMPANY,**

Plaintiff,

vs.

**CARLOS PEREZ OLIVO and
THE ESTATE OF PEGGY HALL,**

Defendants.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CIVIL ACTION NO.: 07-cv-10449(BSJ)

CIVIL ACTION-AFFIRMATION OF SERVICE

I, Randi F. Knepper, Esq., an attorney duly licensed to practice in the United States District Court, Southern District of New York, affirm, under penalties of perjury, that on March 17, 2008, I served the within Notice of Motion on Behalf of Plaintiff Seeking Extension of Time to Affect Service on Defendant, Estate of Peggy Hall, Certification of Counsel, proposed form of Order and this Affirmation of Service upon the following:

Robert A. Buckley, Esq.
310 West 55th Street, Suite 1K
New York, New York 10019
Attorneys for Defendant,
Carlos Perez Olivio

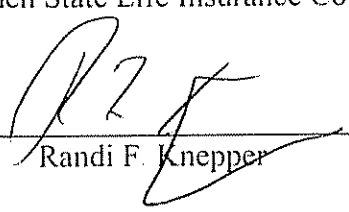
Domenick Napoletano, Esq.
351 Court Street
Brooklyn, New York 11231
The Estate of Peggy Hall

at the above address *via* Federal Express.

McElroy, Deutsch, Mulvaney & Carpenter LLP
Attorneys for Plaintiff,
Garden State Life Insurance Company

Dated: March 17, 2008

By: _____


Randi F. Knepper

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